

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

STEPHANIE WADSWORTH,
individually and as parent and legal
guardian of W.W., K.W., G.W., and L.W.,
minor children, and MATTHEW
WADSWORTH

Plaintiffs,

v.

Case No. 2:23-CV-00118-KHR

JURY TRIAL DEMANDED

WALMART INC. and JETSON
ELECTRIC BIKES, LLC,

Defendants.

DECLARATION OF TALY GOODY IN RESPONSE TO ORDER TO SHOW CAUSE

Pursuant to this Court's Order to Show Cause entered on February 6, 2025 (Dkt. 156)) and pursuant to 28 U.S.C. § 1746, I hereby declare as follows:

1. I am the Founding and Managing Partner at Goody Law Group, LLP. I have been a practicing attorney for almost ten years.
2. I fully understand and appreciate my duties under Local Rule 84.2 (b) as local counsel sponsoring *pro hac vice* admission before this Court. As local counsel in good standing of the Bar of the State of Wyoming and the Bar of this Court, I have been fully prepared to represent my client at any time, in any capacity, and participate in the preparation and trial of the case to the extent required by the Court. I have been present in Court during all proceedings in connection with this case, unless excused by the Court, and I have full authority to act for and on behalf of my clients in this matter.

3. I was served the motion in limine filed on behalf of my clients by co-counsel, and I was stunned that it contained AI-generated cases.
4. My firm referred this case to Morgan & Morgan based on my husband's interest in trying a case with their lead trial attorney. We were further impressed with Morgan & Morgan's ability and resources to handle product liability matters.
5. I am licensed to practice law in California, Wyoming, and Minnesota.
6. I agreed to be local counsel and sponsor the *pro hac vice* admission of both Rudwin Ayala and T. Michael Morgan along with other members of the Morgan & Morgan team, pursuant to Local Rule 84.2(b).
7. I was not responsible for supervising or substantive moving of the case other than what is required in support of the *pro hac vice* motions.
8. I was aware of the scheduling order and the dates related to the motion in limine, however, I did not participate in the formulation, drafting, or research of any issue raised in the motion in limine.
9. Prior to the filing of the motion in limine, I was not sent a copy nor contacted by counsel about the substance of the motion in limine.
10. I was not aware that artificial intelligence was used in the drafting and research of the motion, nor did I have knowledge or access to the artificial intelligence platform utilized by Morgan & Morgan.
11. I am aware of the possibility of artificial intelligence to hallucinate cases, but I do not personally utilize it within my practice.

12. Had the motion been sent for review, it is my hope that I would have noticed the oddity of seven District of Wyoming cases cited in the motion and would have inquired about the same.

13. Based on the foregoing, I respectfully request that this Court not impose sanctions against me under Fed. R. Civ. P. 11(b), (c); 28 U.S.C. § 1927; or the inherent power of the Court.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on February 13, 2025

Signed: /s/ Taly Goody

TALY GOODY, ESQ.

Wyoming Bar No.: 8-6737

GREYSON M. GOODY,

ESQ. GOODY LAW

GROUP

58 Malaga Cove Plaza

Palos Verdes Estates, CA 90274

Telephone: (310) 893-1983

Emails: taly@GoodyLawGroup.com

greyson@GoodyLawGroup.com

Local Counsel

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on February 13, 2025, a true and correct copy of the foregoing was electronically filed with the Clerk of Court using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

/s/ Taly Goody

TALY GOODY, ESQ.

Wyoming Bar No.: 8-6737

**GREYSON M. GOODY,
ESQ. GOODY LAW
GROUP**

58 Malaga Cove Plaza

Palos Verdes Estates, CA 90274

Telephone: (310) 893-1983

Emails: taly@GoodyLawGroup.com

greyson@GoodyLawGroup.com

Local Counsel